

February 3, 1997

Mr. Wayne Morgan
Air Pollution Control Officer
North Coast Unified
Air Quality Management District
2389 Myrtle Avenue
Eureka, California 95501

Dear Mr. Morgan:

RE: Louisiana-Pacific Corporation's Title V Permit

The U.S. Environmental Protection Agency (EPA) appreciates the opportunity to comment on the North Coast Unified Air Quality Management District's (District) draft Title V permit for Louisiana-Pacific Corporation's (L-P) particleboard manufacturing mill located in Arcata, California. Our comments are enclosed.

In a phone conversation you had with David Wampler of my staff in late December, you mentioned that the District is assisting Title V sources by completing the Title V application for the source. EPA believes this assistance is fine, provided the District and the source understand that the source is ultimately responsible for certifying that the content of the application is complete and accurate.

We commend you for the effort put forth in preparing the permit and look forward to working with you and your staff to resolve these comments and any additional comments we may have after we formally review the permit. If you have any questions concerning our comments, please contact David Wampler of my staff at 415-744-1256.

Sincerely,

Matt Haber
Chief, Permits Office
Air Division

Enclosure

cc: Stephan Grant, Louisiana-Pacific, Corporation

EPA Comments
Louisiana-Pacific Corporation
Particleboard Manufacturing Mill
Arcata, California

I. General Comments

Additional information needed:

- a. Table 5 of the application identifies Regulation 1, Rule 482 (b) - (c) as applicable requirements for gasoline storage tanks. The permit, however, does not include any requirement for the gasoline storage tank(s). Table 6 of the application states that L-P is in compliance with the requirement yet the permit identifies the storage tank as permit exempt equipment. Please clarify the status of the diesel storage tank and add all necessary requirements to the permit.
- b. The permit application lists equipment as HC-, HS-, and HD- whereas the permit lists the same equipment as NC-, NS- and ND-. Please make the necessary changes to the permit (or application) to clarify the numbering of the emissions units.
- c. In Section F, the permit lists six equipment items as Exempt Equipment and the District justifies the exemption by stating that no unit specific regulation or rules apply to the units. Although no unit specific requirements apply, generally applicable requirements apply to these units. For example, the General Provision Section C, Condition 1 states, "all equipment of this permit shall at all times be maintained in good working order..." EPA recommends you remove the list and make it clear that general conditions apply to these emissions units.

Complete list of all applicable requirements:

- a. Part 70 requires the permitting authority to cite the origin and authority for all permit conditions. However, none of the Title V permit conditions reference any existing new source review (NSR) permit conditions. Instead, the District cites Regulation 1, Rule 240(d) as the authority for a number of Title V permit requirements. We are concerned that the District rule may not be the appropriate origin for the requirement if a permit condition exists for an emission unit in a NSR permit. In addition to citing Regulation 1, Rule 240(d) as the authority, please cite all existing NSR permit conditions as the origin.
- b. The District has not identified any state-only requirements in the permit; we assume, therefore, that all permit conditions are federally enforceable. If this is not the case, please identify conditions that are not federally enforceable (e.g., Regulation 1, Rule 370: Toxics Hot Spot Assessment).

Citation of applicable requirements:

- a. Regulation 1, Rule 240(h) does not appear to be the appropriate applicable requirement for boiler and collector visible emissions compliance monitoring. Instead, Regulation 1, Rule 420(a) appears to be more appropriate. Also, the cite to General Provision Section D.4 is inappropriate because it is not a monitoring requirement. The appropriate reference appears to be General Provisions L.2.
- b. Regulation 1, Rule 420(e) is not the correct cite for the 40 lbs/hr mass emission rate for particulate matter. The approved SIP and our version of the current District rules shows the correct cite to be Regulation 1, Rule 420(d). Even if the current District rules have changed, applicable SIP requirements should be cited in addition to the current, non-SIP approved rule citation.
- c. Under the General Provisions section of the permit, Condition D.4. states the compliance certification requirements and cites 40 CFR 70.6(c). Please add the District Rule cite for this permit condition.
- d. The District did not adequately cite the origin and authority for the following equipment:
Driers ND-231 ND-232, and ND-233.
 - ▶ Section IV - All Compliance Monitoring conditions except the last one;
 - ▶ Section V - Reporting and Recordkeeping requirements C and D.
Collectors NC-220, NC-224, NC-348, NC-349, NC-370, NC-355, NC-350a and b, NC-274, NC-306, NC-286, NC-191, and NC-385
 - ▶ Section III - Emissions Limitations particulate loading requirement of 0.20 gr/acf. The Driers list this same requirement and cite Regulation 1, Rule 420(a);
 - ▶ Reporting and Recordkeeping requirements and Operating Conditions in Section V and VI, respectively;

II Comments on Permit Units:

1. Wood Fired Boiler:
 - a. In the Compliance Monitoring portion, under the visible emissions section, the permit states, “compliance testing shall be conducted by the above methods and on a frequency in accordance with current policies of the District.” This language is too general and not consistent with Part 70 and Regulation 5, Rule 620 which require the permit to include the periodic monitoring requirements explicitly and not by reference. Furthermore, the General Provisions portion of the permit only discusses the frequency for the compliance certification and does not discuss the frequency for testing. As required by Regulation 5, Rule 620 please list all periodic monitoring

requirements explicitly to ensure the data is representative of the source's compliance with the permit conditions over the relevant time period. At minimum, EPA recommends an annual compliance source test for the visible emissions and particulate matter requirements. Also, please cite the origin and authority for the periodic monitoring requirement if applicable rules require periodic monitoring.

2. Comments for all Collectors:

- a. Please cite the applicable requirement for the particulate loading limit listed in Section III.A.1 of this permit. Also, please modify the language in the second sentence of this section to state, "All emission units which are..."
- b. In the Compliance Monitoring Section, the particulate matter requirement allows the source to use an Approved District method or an engineering evaluation using the District's emissions factors for collectors. Please cite the test method to which you are referring and the frequency for testing because Table II (page 31) should not be used as the sole method for determining compliance with each collector's particulate matter limits.

3. Comments for all Driers

- a. The District has cited Regulation 1, Rule 240(d) as the authority for various emission limits, operating conditions and recordkeeping and reporting requirements. Please also cite, as the origin of these permit terms, all existing permit conditions. In addition some conditions do not have any citation to the origin and authority of permit terms (e.g., Conditions IV.B, IV.C, V.C and D).
- b. In Table 5 of the application, Regulation 1, Rule 240(c-e) is marked as "not applicable" with the reasoning that the rule applies to the regulatory agency. By citing the rule as the authority for the permit conditions, the District implies that this rule is applicable to the source.
- c. As discussed in comment II.1.a above, the District needs to be more specific about the frequency of compliance monitoring in the permit for these emission units.
- d. For compliance with the NO_x emission limit, please explicitly state the monitoring frequency for CARB method 100. In addition, EPA is concerned that temperature may not be an adequate surrogate for determining NO_x emissions from these driers.